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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047
Case No 4:22-MD-03047-YGR
Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

This Document Relates to:

ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER REQUESTING ADDITIONAL
TIME FOR DISCUSSION AND
BRIEFING OF SNAP INC.'S SEARCH
TERMS**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Defendant Snap Inc. (“Snap” or “Defendant”) to finalize search term negotiations from May 31, 2024 to June 7, 2024, with any necessary letter briefing to be submitted by June 14, 2024.

The parties declare in support of this request:

1. Plaintiffs and Snap are engaged in ongoing search term negotiations relating to Plaintiffs’ already served Requests for Production.

2. Plaintiffs and Snap mutually agree that they would benefit from more time to continue their conferrals and attempt to narrow disputes regarding search terms.

3. Plaintiffs and Snap believe that an extension until June 7 to finalize negotiations will afford adequate time for such negotiations.

4. Extending this deadline will not affect any other deadline affixed by the Court.

5. This is the second request to extend this deadline.¹

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Snap to finalize search term negotiations to June 7, with any necessary letter briefing to be submitted by June 14.

IT IS SO ORDERED,

DATED: _____

PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

IT IS SO STIPULATED AND AGREED.

¹ Pursuant to DMC Order No. 6 (ECF 875), the Court originally ordered that search term discussions *and briefing* be concluded by May 31, 2024. On May 23, 2024, the parties requested, and the Court granted on the record, a modification to the order that discussions be concluded by May 31, 2024 but that briefing would be concluded by June 7, 2024. *See* May 23, 2024 Hr’g Tr.

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2 DATED: June 3, 2024

Respectfully submitted,

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ATTESTATION

I, Faye P. Teller, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 3, 2024

By: /s/ Faye P. Teller
Faye P. Teller